

Guidelines for the U.S. Coast Guard Oil Spill Removal Organization Classification Program



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EXECUTIVE SUMMARY

Required Response Plans

Section 4202 of the Oil Pollution Act of 1990 (OPA 90) amended section 311(j) of the Federal Water Pollution Control Act (FWPCA) to require the preparation and submission of response plans by the owners or operators of certain oil-handling facilities and for all vessels defined as “tank vessels” under 46 USC § 2101 (hereafter referred to as plan holders). Further regulations were developed, 33 CFR § §154.1028 and 155.1035, that required plan holders in a pre authorized zone to submit a response plan that required a dispersant capability.

A plan holder is required to submit a response plan that, among other things, identifies and ensures by contract or other means approved by the President, the availability of private personnel and equipment necessary to remove, to the maximum extent practicable, a worst case discharge (WCD), including a discharge resulting from fire or explosion, and to mitigate or prevent a substantial threat of such a discharge.

Complex Response

The system for assembling, mobilizing, and controlling response resources is extremely complex. To meet the statutory requirements, each response plan holder must identify the means for accomplishing these tasks.

Voluntary Classification Program

The Coast Guard created the voluntary oil spill removal organization (OSRO) classification program so that plan holders could list OSROs in response plans in lieu of providing extensive detailed lists of response resources if the organization has been classified by the Coast Guard and their capacity has been determined to equal or exceed the response capability needed by the plan holder. This is allowed under 33 CFR § § 154.1035 and 155.1035.

OSROs and plan holders participate in and use the classification program on a strictly voluntary basis.

Executive Summary, continued

Classified by Core Equipment	OSROs are classified based on “core equipment” that they either own or contract for. This core equipment includes boom, recovery, storage, support equipment such as response vessels and response personnel, dispersant product, and dispersant application platforms.
Plan Holder Responsibility	Using a Coast Guard-classified OSRO does not in any way relieve plan holders of the responsibility of ensuring that their specific response needs are met. These classification guidelines provide a good indicator of an OSRO’s response capability; however, they do not represent a “one-size-fits-all” solution.
Classification Program Success	<p>The purpose of OPA 90 was to develop private sector responsibility for all aspects of oil spill response planning. Realistic response capability is a crucial link in this process, so the emphasis on a comprehensive OSRO classification process is well placed.</p> <p>These guidelines give plan holders a much better tool to use in gauging a classified OSRO’s potential to meet specific planning requirements.</p>
Standard Guidelines for Response	<p>The OSRO classification process represents standard guidelines by which the Coast Guard and plan holders can evaluate an OSRO’s capability to respond to and recover oil spills of various sizes.</p> <p>Plan holders that arrange for the services of a Coast Guard-classified OSRO do not have to list that OSRO’s specific response resources in their plans.</p>
Classification Does Not Guarantee Performance	<p>Being a Coast Guard-classified OSRO, however, does not guarantee the performance of that OSRO during an oil spill.</p> <p>Identifying a Coast Guard-classified OSRO as part of a facility response plan (FRP) or tank vessel response plan (VRP) submission does not relieve plan holders of the primary responsibility to ensure that their OSROs are able to respond effectively and to provide the complete range of capability required by the FRP or VRP regulations.</p>
Guidelines for Program Participants and Nonparticipants	While these guidelines specifically apply to OSROs participating in the Coast Guard classification program, similar criteria will be used to assess the capability of OSROs identified in response plans that do not participate in the classification program.

Chapter 1

Background

Overview

Introduction

The OSRO classification program was developed to complement the response plan development and review processes by systematically classifying OSROs. The program is voluntary, and classification does not guarantee performance.

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Purpose

Required Response Plans and the Coast Guard Classification Program

The OSRO classification process was developed to facilitate the preparation and review of FRPs and VRPs.

Section 4202 of OPA 90 amended Section 311(j) of the FWPCA to require the preparation and submission of response plans by the owners or operators of certain oil-handling facilities and of all vessels defined as “tank vessels” under 46 USC § 2101 (hereafter referred to as plan holders).

Systematic Classification

The OSRO classification program provides a standardized system to classify response entities. Once classified, plan holders can list OSROs by name and classification as an alternative to listing extensive resources in their FRPs and VRPs, see 33 CFR § 154.1035, 155.1035, 155.1040, 154.1045, 154 Appendix C.

Classification Does Not Guarantee Performance

An OSRO classification does not guarantee the performance of an OSRO, nor does the use of a Coast Guard-classified OSRO in a plan relieve plan holders of their ultimate statutory and regulatory responsibility to ensure the adequacy of the spill response resources identified in a response plan.

Applicability

Voluntary Participation

OSRO classification is a strictly voluntary process in which OSROs can participate and plan holders can utilize for planning purposes.

An OSRO does not have to be classified and plan holders do not have to limit their response resources to Coast Guard classified OSROs.

OSROs agree to meet all program requirements to participate in the classification program. The same criteria will be used by the Coast Guard to evaluate the capability of OSROs identified in response plans but not participating in the classification program.

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Guidelines Changes

New in this Revision

This revision includes guidance on Dispersant Providing OSROs since the passage of 33 CFR 154.1045 and 33 CFR 155.1050 regulations. Also new in this revision worst case discharge will be abbreviated to WCD, Group V evaluation criteria, and the new Alternate Classification Cities have been included. Changes that were made as a result of the 2002 Addendum to these guidelines have been incorporated.

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Chapter 2

Processes and Resource Requirements

Overview

General This Chapter specifically addresses those processes and resource requirements that are common between classifying Mechanical and Dispersant Providing OSROs.

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Application Process

Introduction

In order to become a classified OSRO companies must agree to inclusion of all equipment in the Response Resource Inventory (RRI) and must provide a letter attesting to the accuracy of information provided.

Voluntary Application

Any OSRO may voluntarily apply for classification. Application materials and instructions may be obtained directly from the NSFCC or via the Internet at the address below.

Commanding Officer National Strike Force Coordination Center ATTN:
Response Resource Assessment Branch 1461 North Road Street Elizabeth
City, NC 27909-3241 Tel: (252) 331-6000 / Fax: (252) 331-6012
<http://www.uscg.mil/hq/nsfweb/nsfcc/ops/ResponseSupport/RRAB/becomeaclassifiedosro.html>

Response Resource Inventory

The Coast Guard uses standard calculations to determine compliance with equipment standards and response times.

Classification is assigned based on the information supplied by each OSRO. The Coast Guard employs a database known as the Response Resource Inventory (RRI) to record OSRO information. Participation in the RRI is mandatory for an OSRO to receive a classification. For an application to be accepted, all pertinent RRI data fields must be completed.

Using the response times, discharge quantities, and equipment requirements specified in the FRP and VRP regulations 33 CFR §§ 154.1045, 154.1047, 154 Appendix C, 155.1050, 155.1052, and 155 Appendix B and in these guidelines, the NSFCC determines the appropriate classification(s) for each COTP city or Alternate Classification City (ACC) requested by an OSRO.

Attestment Letter

The OSRO also must provide an attestment letter.

The letter must include, at a minimum, the following information:

- The application is accurate and factual to the best of the submitter's knowledge.
- The OSRO complies with the resource maintenance, personnel training, and exercise requirements outlined in these guidelines.
- The OSRO has all support components needed to deploy the core equipment and the logistics network needed to sustain the resources at an incident for the time periods specified in the FRP and VRP regulations (examples of support components include personnel, boats, anchors, hoses, lines, etc.).
- A statement that agrees to allow the Coast Guard to visit its resource sites for the purposes of verifying the information in the application and its compliance with the provisions of these guidelines.

Continued on next page

Application Process, continued

Attestment Letter, continued

An example of an acceptable attestment letter, with the required information, is shown in Figure 1.

Figure 1. Sample Attestment Letter

I, the undersigned, attest to the fact that to the best of my knowledge, the response resource information contained in this application is accurate and factual. This company and all subcontractors identified in this application maintain, inspect, and operate the response equipment in accordance with the manufacturer's recommendations and best commercial practices. All inspection and maintenance is documented, and records are maintained for 3 years. Company response personnel and all subcontractors identified in this application, including volunteers when used, are trained sufficiently, in accordance with Occupational Safety and Health Administration (OSHA) standards for emergency response operations in 29 CFR 1910.120, to operate the equipment included in this application. These records are maintained for a period of no less than 3 years. This company and all subcontractors identified in this application meet or exceed the exercise requirements as outlined in the PREP guidelines for each plan in which it is listed, and documentation to this effect is maintained for 3 years and is available for verification. The company and all subcontractors also agree to be visited by Coast Guard personnel for the purpose of verifying the information contained therein.

Alternative Compliance Methods

Request for Alternative Compliance

OSROs may request the Coast Guard to consider alternative standards to the ones presented in these guidelines. Alternative compliance requests will be considered based on the following criteria: (1) Compliance with the standards are economically or physically impractical; (2) The alternative provides an equivalent level of safety and protection from pollution by oil or hazardous material, which is documented in the request; and (3) The request has been submitted in writing to the NSFCC.

Alternative Compliance Standard in Response Plan Regulations

The alternative compliance standards that will be considered are those allowed within the FRP and VRP regulations, as outlined in Table 1 of this page.

Table 1. Acceptable Alternative Standards and Regulatory Cites

Category	Section in Response Plan Regulations	
	Facility 33 CFR § 154	Tank Vessels 33 CFR § 155
EDRC	Appendix C, Section 6.3	Appendix B, Section 6.3
Travel Speed	Appendix C, Section 2.6	Appendix B, Section 2.6
TSC	Appendix C, Section 9.2	Appendix B, Section 9.2
Boom	No cite; based on ACP	Appendix B, Table 2

Request for Alternative Response Times

OSROs may request approval for alternative response time standards (notification, mobilization, and travel time).

Review Process

Application Package An applicant's resources, narratives, and attestation letter—provided as a completed application package—are reviewed and evaluated for classification by the NSFCC.

Consultation with COTP(s) As part of the application review, the NSFCC consults with the applicable COTP(s) where an OSRO is requesting classification.

Classification Letter and Profile After the review is completed, the NSFCC issues a classification letter to an applicant.

The letter includes a classification profile that provides information on classification levels and coverage.

Appeal of Classification Decision If an OSRO does not agree with the classifications determined by the NSFCC, it may request a reconsideration of the classification decision.

If the NSFCC does not adequately address its concern, an OSRO may submit a written appeal to the OSRO Program Manager at Coast Guard Headquarters:

COMMANDANT (CG-533)
U.S. Coast Guard Headquarters
2100 2nd St. SW Washington,
DC 20593-0001

OSRO Exercises

Introduction

Both the FRP and VRP regulations require that plan holders conduct annual equipment deployment exercises involving the OSROs listed in their response plans 33 CFR § 154.1055 and 155.1060.

An OSRO that is listed as the primary response organization in a response plan desiring to obtain and maintain a classification must participate in and keep documentation of these completed exercises.

PREP Guidelines

The National Preparedness for Response Exercise Program (PREP) guidelines were updated in August 2002 and contain a detailed description of exercise requirements.

NOTE: The PREP guidelines can be obtained on-line at www.uscg.mil/hq/g-m/nmc/response/msprep.pdf or at no cost from:

TASC DEPT
Warehouse 33141Q
75th Avenue
Landover, MD 20785
Fax: (301) 386-5394

Include the following information: Publication Number PREP Guidelines: USCG-X0191 Training: "in printing," Name of Publication Quantity.

Owned, Contracted, or Arranged by Other Means

For OSROs using a combination of owned and contracted resources to meet the requirements for classification, exercises must include both categories of resources working together and integrating separate system components provided by multiple OSROs.

Additional Exercises

In addition to equipment deployment, exercises should include mobilization, transportation, and logistics support aspects, especially as they relate to WCD Tier 1 resources.

To the maximum extent practicable, OSROs are encouraged to work with plan holders and the local area committees to hold equipment deployment exercises in conjunction with annual spill management team or Area exercises.

Additionally, whenever possible, OSROs are encouraged to use these exercises as an opportunity to validate response strategies contained in response and contingency plans.

Personnel Training

Required by Response Plans and the Classification Program

The FRP and VRP regulations require plan holders to ensure that response personnel are trained to perform their jobs as listed in the plans 33 CFR § 154.1045 and 155.1055. The OSRO classification program requires an OSRO to provide similar assurance.

Program Components

Explanation must be provided to demonstrate that an OSRO has identified key skills needed in a response and show that personnel have received the proper training to perform in those areas, course syllabus need not be provided. Descriptions of the methods in which training is delivered to OSRO personnel should be provided.

An effective response training program should include, but is not limited to, the following:

- Actions to take in accordance with designated job responsibilities
- Occupational Safety and Health Administration (OSHA) requirements outlined in 29 CFR § 1910.120
- Communications
- Training on specific response equipment identified in the OSRO application

Periodic Training

Training must be conducted periodically to reinforce the required knowledge.

Training Records

Training records must be maintained for 3 years following completion of the training. Their location must be noted in the initial classification application and all records must be available for review during NSFCC Preparedness Assessment Visits (PAV).

Equipment Maintenance

Periodic Inspection and Maintenance

An OSRO must ensure that response resources listed in its application are inspected periodically and maintained in good operating condition, in accordance with the manufacturer's recommendations and best commercial practices.

Maintenance Records

All inspections and maintenance must be documented and the records maintained for 3 years. Their location must be noted in the initial classification application and all records must be available for review during assessment visits by the NSFCC.

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Resource Requirements

Personnel

The number of personnel needed to support a response depends on numerous factors.

- For the OSRO classification program, the number of personnel required for a classification for each COTP city or ACC is based on the location of resources.
- During the application process, an OSRO must identify the number of personnel required to mobilize and operate the resources at each of its resource sites.
- Each site that meets the time requirements for a classification must have its personnel requirements totaled for that classification.
- If sufficient personnel have been identified by the OSRO that meet the response time requirements and concurrently can deploy and operate all equipment necessary for that level of classification, then an OSRO qualifies for that classification.

Counting Resources for Classification

Resources that are owned or contracted in addition to dedicated and non-dedicated resources, may be counted for classification.

Dedicated vs. Nondedicated Resources

OSROs may identify either dedicated or nondedicated resources to obtain a classification. Since nondedicated resources may not be available to respond immediately, longer notification and mobilization times are assigned to these resources to account for their possible non availability.

Owned Contracted, or Arranged by Other Means

FRP and VRP regulations require plan holders to ensure the availability of response resources by contract or other approved means.

OSROs must meet these same requirements for all response resources (dedicated, nondedicated, owned, and non owned equipment and personnel) that they claim for classification purposes. At a minimum, this requires a letter of intent (LOI) from the owner of a resource.

Classifying OSROs

The program uses a combination of planning volume capacities and other information found in FRP and VRP regulations to classify OSROs.

For the OSRO classification program, the classifications of MMPD and WCD Tiers 1, 2, and 3 will be issued.

Response Times

General

In addition to resource quantities, OSROs are required to meet certain response times 33 CFR § 154.1045 and 155.1050. The response times for classification were derived from the regulations and standardized for classification through a series of workshops. The response times outlined in Title 33 CFR § 154 Appendix C, para 2.6 and 155 Appendix B, para 2.6, and are summarized in Tables 7 and 16.

Classified for COTP City or ACC

To receive a classification for a specific COTP city or ACC, an OSRO must ensure that the resources outlined in Tables 3–5 are able to meet the response times specified in Table 7 or 16.

Computing Response Times

The response plan regulations require the plan holder to include the time for notification, mobilization, and travel when computing response times 33 CFR Part 154 Appendix C, para 2.6 155 Appendix B, para 2.6. Therefore, the time needed for a resource to move from its primary staging site to a classification point is the sum of the notification, mobilization, and travel times.

The OSRO classification program calculates response times by combining the notification and mobilization times and travel times of the resource sites used for a specific classification.

Mobilization

Mobilization is defined as the time it takes to get the resources assembled and prepared at the staging site. Mobilization begins when notification ends and ends when the resources are ready to move off-site.

Resource Notification/Mobilization Time

The time to notify and mobilize resources at a site is largely based on how much control the OSRO has over those resources. For this reason, different mobilization times are used for calculating OSRO classifications based on resource status (see Table 2).

OSROs are required to provide information on the status of each of their response resources during the application process. By using Table 2, an OSRO determines the notification/mobilization time for each response resource included in its application.

Summary of Resource Notification/Mobilization Times

Table 2. Resource Notification/Mobilization Response Times in Hours

Resource Status	Response Personnel Availability	
	On-Site (OS) ¹	Recall (R) ²
Owned/Dedicated (O/D)	1	2
Contract or Dedicated (C/D)	1.5	2.5
Owned/Non-dedicated (O/ND)	2.5	3.5
Contract /Non-dedicated (C/ND)	3	4

Notes: Full-time personnel are a dedicated resource; part-time personnel are a nondedicated resource. Table includes 0.5 hours between discovery of discharge and notification of OSRO.

1 On-site means a 24-hour staffed resource site.

2 Available on recall means personnel recalled on beeper or phone tree.

Level of Control

If a resource is owned by an OSRO, then the OSRO has high control. If the resources are contracted then the OSRO has less control.

The amount of control also depends on whether the resource is dedicated or nondedicated. Dedicated resources are more likely to have a quicker notification and mobilization time than those that are nondedicated since the dedicated resources are not committed to other activities and therefore are more readily available.

Resource sites that are owned and dedicated are presumed to be more capable of mobilizing faster than those that are contracted and nondedicated.

Computing Travel Times

Travel times are computed using standard speeds (as noted below), and the highway or water distance between an OSRO site and specified geographic locations within the COTP zone.

Travel speeds of 35 miles per hour (mph) for land and 5 knots (kts) for water and 100 knots for aircraft are used for OSRO classification calculations. These values are from the response plan regulations (33 CFR § 154, Appendix C, para 2.6 and 33 CFR § 155, Appendix B, para 2.6). The distance is divided by the speed to determine the travel time:

Travel time = Distance between OSRO site and COTP city/ACC 35 mph or 5 kts or 100 kts

Computing Site Response Times

The total response time assigned to each site is the sum of the notification and mobilization times from Table 2, and the travel time to the geographic points mentioned above.

Chapter 3 Description of Classifications (Mechanical OSRO's)

Overview

Introduction

OSROs are classified based on the location of response resources and an assessment of the ability to mobilize those resources to the Captain of the Port (COTP) city or Alternate Classification City (ACC). There are equipment standards and response times specific to each operating area within a COTP zone. Additional requirements are outlined for the Prince William Sound, Alaska COTP zone and shallow water environments. This chapter also discusses exercises, personnel training, and equipment maintenance specific to the OSRO classification program.

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Resource Requirements

Core Resources

Core resources are separated into five categories:

1. Protective boom
2. Effective daily recovery capacity (EDRC) and containment boom
3. Temporary storage capacity (TSC)
4. Response vessels
5. Personnel

NOTE: Both protective and containment boom are measured in feet. EDRC is measured in barrels per day (bbls/day), while TSC is measured in barrels (bbls).

Protective Boom

The VRP regulation requires a plan holder to have available a specific amount of boom for shoreline protection purposes for maximum most probable discharges (MMPDs) and WCDs, 33 CFR § 155, Appendix B, Table 2.

For classification purposes, it is assumed that the OSRO has both vessel and facility clients. Since the protective boom requirements for vessel response plan holders are more restrictive and specific, these requirements are used for OSRO classification, 33 CFR § 155 Appendix B, para 5.6. If an OSRO certifies that it only serves facility customers, it can submit, in writing to the National Strike Force Coordination Center (NSFCC), a request to base its protective boom requirements on the amount specified in Area Contingency Plans (ACPs) and FRP for the relevant COTP zone in accordance with 33 CFR § 154 Appendix B, para 5.6.

EDRC and Containment Boom

EDRC, containment boom, and response vessels are interrelated for OSRO classifications. For planning purposes, EDRC credit is counted only toward an OSRO's classification if there is, at a minimum, 300 feet of containment boom available to be deployed in the applicable operating area to complete the skimming system. Also, per the FRP and regulations 33 CFR § 154.1045 an OSRO must have 1,000 feet of containment boom in addition to the 300 feet per skimming system required by the NSFCC.

Response vessels need to be identified to support the recovery devices that also meet the FRP and VRP time requirements outlined in these guidelines.

Continued on next page

Resource Requirements, continued

EDRC and Containment Boom, *continued*

NOTE: OSROs should use at, a minimum, the boom amounts recommended by a skimming system's manufacturer. On average, manufacturer boom amounts are 300 feet.

If the skimmer is designed in a way that containment boom needed is less than 300 feet, an OSRO can request an alternative compliance in writing from the NSFCC for the amount that is recommended by the manufacturer.

Temporary Storage Capacity

An OSRO must identify TSC equaling twice the EDRC included in a classification application 33 CFR § 154, Appendix C, para 9.2 and 155, Appendix B, para 9.2. An OSRO's classification is limited by the lowest-rated component of the recovery system.

TSC and EDRC are interrelated. For example, if an OSRO has 10,000 bbls/day EDRC but only has available 14,000 bbls TSC, then its recovery capacity is limited to 7,000 bbls/day (one half of the available TSC capability).

Non-dedicated TSC

For the purposes of application processing, all TSC supplied by Tank Barge and Mobile Storage is considered non-dedicated by the USCG classification program. Tank Barges and Mobile Storage is assumed to be engaged in transporting oil between various locations and is therefore full of oil half of the time and empty half of the time and therefore, only fully capable of supplying the total amount of TSC required half of the time.

Due to the offset times in Table 6 of these guidelines, non-dedicated temporary storage would normally not qualify for the MMPD and WCD1 mobilization time of 2 hours. As an exception, the USCG classification program is allowing non-dedicated Tanker Barges and Mobile Storage (i.e. vacuum trucks) to qualify for the MMPD and WCD1 mobilization if the non-dedicated TSC is provided at a 2:1 redundancy.

- Dedicated mobilization offset times will be used for non-dedicated TSC resources if the non-dedicated TSC resources are provided at two times the TSC requirement using mutually exclusive assets, also known as a 2:1 ratio.
 - This exception is only available to Tank Barges (T/B) and Mobile Storage
 - Not available to Fixed Storage.
 - Mobile storage is still limited to 45% of your total TSC.
 - Fixed storage is still limited to 35% of your total TSC.

Continued on next page

Resource Requirements, continued

Fixed Storage Tankage Ashore

Fixed tankage can be identified to meet the TSC requirements in limited circumstances.

- Accepted only for OSRO classifications covering the rivers/canals, Great Lakes, and inland operating areas.
- Allowed for up to 35% of an OSRO's TSC for the rivers/canals, Great Lakes, and inland operating areas provided that the OSRO certifies that it can transport recovered oil to the fixed tankage ashore and sustain the required EDRC.
- Not allowed in the nearshore, offshore, or open ocean operating areas.

Vacuum Trucks

Vacuum trucks have the below have the following considerations/limitations.

- Not permitted for EDRC and TSC credit in the nearshore, offshore, and open ocean operating areas.
- Limited to a maximum of 45% EDRC and TSC in the rivers/canals, Great Lakes, and inland operating areas unless an OSRO provides the proper documentation from the applicable COTP authorizing the on-deck transport of a vehicle(s) with EDRC and TSC capability for all operating areas.
- Each vacuum truck receiving EDRC credit requires 300 feet of containment boom.

Response Vessels

Response vessels are integral to every response. Vessels intended for response services must be clearly identified in the application process.

Although response vessels are not calculated programmatically into a classification, the NSFCC reviews available response vessels. If a shortfall is perceived, further discussion with the OSRO is warranted before a classification is considered.

Only response vessels that meet the response time requirements outlined in these guidelines by tier will be considered. All response vessels identified must meet applicable Coast Guard regulations and policy guidelines (e.g., navigation lights, safety equipment, life vests).

MMPD and WCD Tier 1 Classifications

Only resources located at equipment sites capable of being mobilized and enroute to the scene of a spill within 2 hours of notification are counted toward MMPD and WCD1 classifications.

Because of the potential for nondedicated resources to be committed to other functions, only dedicated resources are presumed to be able to mobilize within these time requirements.

WCD Tier 2 and WCD Tier 3 Classifications

Owned or contracted, dedicated or nondedicated equipment is allowed for WCD2 and WCD3 classification.

**Group V
Evaluation**

Equipment that is owned or contracted and used to respond to Group V oil spills per 33 CFR §154.1047 and 33 CFR §155.1052 will be evaluated to determine suitability and ability to respond to Group V oils. Those classified OSROs that maintain the resources and/or capabilities necessary to respond to Group V oil spills will be published on our web site. The evaluation of Group V capabilities will be evaluated based on the following:

- (1) Sonar, sampling equipment, or other methods for locating the petroleum oil on the bottom or suspended in the water column;
- (2) Containment boom, sorbent boom, silt curtains, or other methods for containing the petroleum oil that may remain floating on the surface or to reduce spreading on the bottom;
- (3) Dredges, pumps, or other equipment necessary to recover petroleum oil from the bottom and shoreline;
- (4) Equipment necessary to assess the impact of such discharges; and
- (5) Other appropriate equipment necessary to respond to a discharge involving the type of petroleum oil handled, stored, or transported.
- (6) The equipment must be suitable for the geographic area authorized for operations. i.e. ice conditions in Alaska, etc.

**Dedicated vs.
Nondedicated
Resources**

Since nondedicated tank barges used for TSC credit may operate significant distances from their classification resource sites, an OSRO must further ensure the availability of nondedicated barges by contract or other approved means in quantities equal to twice what the OSRO requires of the dedicated resources.

Continued on next page

Resource Requirements, continued

Response Plan Regulations and the Classification Program

FRP and VRP regulations specify the quantity of resources required for specific planning volumes.

The requirements are categorized as the MMPD and WCD (see Table 3 for planning volumes). WCD is divided into Tiers 1, 2, and 3.

Table 3. Planning Volumes for Discharge Categories

Category	Facility	Tank Vessel
MMPD	1,200 bbls or 10% of WCD	2,500 bbls or 10% of WCD
WCD	Largest foreseeable oil discharge	Entire loss of oil cargo

MMPD and WCD are based on a calculation using a facility's largest foreseeable oil discharge or a tank vessel's cargo volume.

Operating Areas

Manufacturers design boom, oil recovery devices, and TSC equipment with certain operating areas in mind. In the response plan regulations, these operating areas are identified as rivers/canals, Great Lakes, inland, nearshore, offshore, and open ocean (see Glossary). The OSRO classification program classifies OSROs based on these areas.

In this Chapter, the Section on Specific Classification Standards by Operating Area lists specific requirements for boom, EDRC, and TSC for each of these areas.

Resource Requirements, continued

Boom, EDRC, and TSC Quantities

To receive an MMPD, WCD1, WCD2, or WCD3 classification, an OSRO must meet all boom, EDRC, and TSC amounts to obtain a single classification, and each classification is determined independently for each operating area (see Tables 4–6).

Table 4. Boom Amounts in Feet for OSRO Classifications

Area	Configuration	MMPD	WCD1	WCD2	WCD3
Rivers/Canals	Protective	4,000	25,000	25,000	25,000
Great Lakes	Protective	6,000	30,000	30,000	30,000
Inland	Protective	6,000	30,000	30,000	30,000
Nearshore	Protective	8,000	30,000	30,000	30,000
Offshore	Protective	8,000	15,000	15,000	15,000
Open Ocean	Protective	0	0	0	0

Table 5. EDRC Amounts in Barrels per Day for OSRO Classifications

Area	MMPD	WCD1	WCD2	WCD3
Rivers/Canals	1,200	1,875	3,750	7,500
Great Lakes	1,200	6,250	12,500	25,000
Inland	1,200	12,500	25,000	50,000
Nearshore	1,200	12,500	25,000	50,000
Offshore	1,200	12,500	25,000	50,000
Open Ocean	1,200	12,500	25,000	50,000

Table 6. TSC Amounts in Barrels for OSRO Classifications

Area	MMPD	WCD1	WCD2	WCD3
Rivers/Canals	2,400	3,750	7,500	15,000
Great Lakes	2,400	12,500	25,000	50,000
Inland	2,400	25,000	50,000	100,000
Nearshore	2,400	25,000	50,000	100,000
Offshore	2,400	25,000	50,000	100,000
Open Ocean	2,400	25,000	50,000	100,000

Response Times

Summary of Response Times

Table 7. Response Times in Hours for Containment Boom, EDRC, and TSC Resources

Area	Facility or Tank Vessel	MMPD	WCD1	WCD2	WCD3
Rivers/Canals	Fac	12	12	36	60
	Vsl	24	24	48	72
	FHVP	6	6	30	54
	VHVP	12	12	36	60
Great Lakes	Fac	6	12	36	60
	Vsl	12	18	42	66
	FHVP	N/A	N/A	N/A	N/A
	VHVP	N/A	N/A	N/A	N/A
Inland	Fac	12	12	36	60
	Vsl	24	24	48	72
	FHVP	6	6	30	54
	VHVP	12	12	36	60
Nearshore	Fac	12	12	36	60
	Vsl	24	24	48	72
	FHVP	6	6	30	54
	VHVP	12	12	36	60
Offshore	Fac	12	12	36	60
	Vsl	24	24	48	72
	FHVP	6	6	30	54
	VHVP	12	12	36	60
Open Ocean	Fac	12	12	36	60
	Vsl	24	24	48	72
	FHVP	6	6	30	54
	VHVP	12	12	36	60

Key: Fac - facilities; Vsl - tank vessels; FHVP - facility higher volume ports; VHVP - tank vessel higher volume ports.

Response Times for Facilities and Tank Vessels

The Coast Guards classification program uses two major categories of response times—facilities and tank vessels—because of the differences between the respective FRP and VRP regulations.

Higher Volume Port Areas

If a COTP zone contains a higher volume port (see Glossary), response times for a mechanical OSRO classifications are more stringent per the regulations.

Specific Classification Standards by Operating Area

Rivers/Canals Minimum equipment standards and maximum response times for classifying OSROs for planned response to spills in the rivers/canals operating area are summarized in Table 8, which is derived from Tables 4–6. All equipment to be used in this area must be capable of operating in 1-foot wave heights.

Table 8. Equipment Standards and Response Times for the Rivers/Canals Operating Area

Protective Boom (feet)	Containment Boom (feet)	Oil Recovery Equipment (bbls/day EDRC)	Recovered Oil Storage (bbls TSC)	Facility Response Times (hours) ¹	Tank Vessel Response Times (hours) ¹
MMPD (1,200 bbls/day recovery)					
4,000	1,000 plus 300 per skimming system	1,200	2,400	6 for higher volume ports 12 for all other locations	12 for higher volume ports 24 for all other locations
WCD1 (1,875 bbls/day recovery)					
25,000	1,000 plus 300 per skimming system	1,875	3,750	6 for higher volume ports 12 for all other locations	12 for higher volume ports 24 for all other locations
WCD2 (3,750 bbls/day recovery)					
25,000	1,000 plus 300 per skimming system	3,750	7,500	30 for higher volume ports 36 for all other locations	36 for higher volume ports 48 for all other locations
WCD3 (7,500 bbls/day recovery)					
25,000	1,000 plus 300 per skimming system	7,500	15,000	54 for higher volume ports 60 for all other locations	60 for higher volume ports 72 for all other locations

Note: For protective boom requirements for the WCD1 level, the response times are 12 hours for a High Volume Port and 24 hours for all others.

Boom Properties	Boom height (draft plus freeboard) (inches)	6–18
	Reserve buoyancy-to-weight ratio	2:1
	Total tensile strength (lbs)	4,500
	Skirt fabric tensile strength (lbs)	200
	Skirt fabric tear strength (lbs)	100

Specific Classification Standards by Operating Area, continued

Great Lakes Minimum equipment standards and maximum response times for classifying an OSRO for planned response to spills in the Great Lakes operating area are summarized in Table 9, which is derived from Tables 4–6. All equipment to be used in this operating area must be capable of operating in 4-foot wave heights.

Table 9. Equipment Standards and Response Times for the Great Lakes Operating Area

Protective Boom (feet)	Containment Boom (feet)	Oil Recovery Equipment (bbbls/day EDRC)	Recovered Oil Storage (bbbls TSC)	Facility Response Times (hours) ¹	Tank Vessel Response Times (hours) ¹
MMPD (1,200 bbbls/day recovery)					
6,000	1,000 plus 300 per skimming system	1,200	2,400	6	12
WCD1 (6,250 bbbls/day recovery)					
30,000	1,000 plus 300 per skimming system	6,250	12,500	12	18
WCD2 (12,500 bbbls/day recovery)					
30,000	1,000 plus 300 per skimming system	12,500	25,000	36	42
WCD3 (25,000 bbbls/day recovery)					
30,000	1,000 plus 300 per skimming system	25,000	50,000	60	66

Note: For protective boom requirements for the WCD1 level, the response times are 12 hours for a High Volume Port and 24 hours for all others.

Boom	Boom height (draft plus freeboard) (inches)	18–42
Properties	Reserve buoyancy-to-weight ratio	2:1
	Total tensile strength (lbs)	15,000–20,000
	Skirt fabric tensile strength (lbs)	300
	Skirt fabric tear strength (lbs)	100

Specific Classification Standards by Operating Area, continued

Inland Minimum equipment standards and maximum response times for classifying an OSRO for planned response to spills in the inland operating area are summarized in Table 10, which is derived from Tables 4–6. All equipment to be used in this operating area must be capable of operating in 3-foot wave heights.

Table 10. Equipment Standards and Response Times for the Inland Operating Area

Protective Boom (feet)	Containment Boom (feet)	Oil Recovery Equipment (bbls/day EDRC)	Recovered Oil Storage (bbls TSC)	Facility Response Times (hours) ¹	Tank Vessel Response Times (hours) ¹
MMPD (1,200 bbls/day recovery)					
6,000	1,000 plus 300 per skimming system	1,200	2,400	6 for higher volume ports 12 for all other locations	12 for higher volume ports 24 for all other locations
WCD1 (12,500 bbls/day recovery)					
30,000	1,000 plus 300 per skimming system	12,500	25,000	6 for higher volume ports 12 for all other locations	12 for higher volume ports 24 for all other locations
WCD2 (25,000 bbls/day recovery)					
30,000	1,000 plus 300 per skimming system	25,000	50,000	30 for higher volume ports 36 for all other locations	36 for higher volume ports 48 for all other locations
WCD3 (50,000 bbls/day recovery)					
30,000	1,000 plus 300 per skimming system	50,000	100,000	54 for higher volume ports 60 for all other locations	60 for higher volume ports 72 for all other locations

Note: For protective boom requirements for the WCD1 level, the response times are 12 hours for a High Volume Port and 24 hours for all others.

Boom Properties	Boom height (draft plus freeboard) (inches)	18–42
	Reserve buoyancy-to-weight ratio	2:1
	Total tensile strength (lbs)	15,000–20,000
	Skirt fabric tensile strength (lbs)	300
	Skirt fabric tear strength (lbs)	100

Specific Classification Standards by Operating Area, continued

Nearshore Minimum equipment standards and maximum response times for classifying an OSRO for planned response to spills in the nearshore operating area (classified as the ocean operating environment) are summarized in Table 11, which is derived from Tables 4–6. With the exception of shoreline protection boom, all equipment to be used in this operating area must be capable of operating in 6-foot wave heights.

Table 11. Equipment Standards and Response Times for the Nearshore Operating Area

Protective Boom (feet)	Containment Boom (feet)	Oil Recovery Equipment (bbls/day EDRC)	Recovered Oil Storage (bbls TSC)	Facility Response Times (hours) ¹	Tank Vessel Response Times (hours) ¹
MMPD (1,200 bbls/day recovery)					
8,000	1,000 plus 300 per skimming system	1,200	2,400	6 for higher volume ports 12 for all other locations	12 for higher volume ports 24 for all other locations
WCD1 (12,500 bbls/day recovery)					
30,000	1,000 plus 300 per skimming system	12,500	25,000	6 for higher volume ports 12 for all other locations	12 for higher volume ports 24 for all other locations
WCD2 (25,000 bbls/day recovery)					
30,000	1,000 plus 300 per skimming system	25,000	50,000	30 for higher volume ports 36 for all other locations	36 for higher volume ports 48 for all other locations
WCD3 (50,000 bbls/day recovery)					
30,000	1,000 plus 300 per skimming system	50,000	100,000	54 for higher volume ports 60 for all other locations	60 for higher volume ports 72 for all other locations

Note: For protective boom requirements for the WCD1 level, the response times are 12 hours for a High Volume Port and 24 hours for all others.

Boom

Properties

	Containment	Shoreline Protection
Boom height (draft plus freeboard)(inches)	≥ 42	≥ 18
Reserve buoyancy-to-weight ratio	3:1 to 4:1	> 2:1
Total tensile strength (lbs)	> 20,000	> 15,000
Skirt fabric tensile strength (lbs)	500	> 300
Skirt fabric tear strength (lbs)	125	> 100

Specific Classification Standards by Operating Area, continued

Offshore Minimum equipment standards and maximum response times for classifying an OSRO for planned response to spills in the offshore operating area (classified as the ocean operating environment) are summarized in Table 12, which is derived from Tables 4–6. All equipment to be used in this operating area must be capable of operating in 6-foot wave heights.

Table 12. Equipment Standards and Response Times for the Offshore Operating Area

Protective Boom (feet)	Containment Boom (feet)	Oil Recovery Equipment (bbls/day EDRC)	Recovered Oil Storage (bbls TSC)	Facility Response Times (hours) ¹	Tank Vessel Response Times (hours) ¹
MMPD (1,200 bbls/day recovery)					
8,000	1,000 plus 300 per skimming system	1,200	2,400	6 for higher volume ports 12 for all other locations	12 for higher volume ports 24 for all other locations
WCD1 (12,500 bbls/day recovery)					
15,000	1,000 plus 300 per skimming system	12,500	25,000	6 for higher volume ports 12 for all other locations	12 for higher volume ports 24 for all other locations
WCD2 (25,000 bbls/day recovery)					
15,000	1,000 plus 300 per skimming system	25,000	50,000	30 for higher volume ports 36 for all other locations	36 for higher volume ports 48 for all other locations
WCD3 (50,000 bbls/day recovery)					
15,000	1,000 plus 300 per skimming system	50,000	100,000	54 for higher volume ports 60 for all other locations	60 for higher volume ports 72 for all other locations

Note: For protective boom requirements for the WCD1 level, the response times are 12 hours for a High Volume Port and 24 hours for all others.

Boom Properties

	Containment	Shoreline Protection
Boom height (draft plus freeboard)(inches)	≥ 42	≥ 18
Reserve buoyancy-to-weight ratio	3:1 to 4:1	> 2:1
Total tensile strength (lbs)	> 20,000	> 15,000
Skirt fabric tensile strength (lbs)	500	> 300
Skirt fabric tear strength (lbs)	125	> 100

Specific Classification Standards by Operating Area, continued

Open Ocean Minimum equipment standards and maximum response times for classifying an OSRO for planned response to spills in the open ocean operating area (classified as the ocean operating environment) are summarized in Table 13, which is derived from Tables 4–6. All equipment to be used in this operating area must be capable of operating in 6-foot wave heights.

Table 13. Equipment Standards and Response Times for the Open Ocean Operating Area

	Protective Boom (feet)	Containment Boom (feet)	Oil Recovery Equipment (bbls/day EDRC)	Recovered Oil Storage (bbls TSC)	Facility Response Times (hours)	Tank Vessel Response Times (hours)
	MMPD (1,200 bbls/day recovery)					
	No requirements	1,000 plus 300 per skimming system	1,200	2,400	6 for higher volume ports 12 for all other locations	12 for higher volume ports 24 for all other locations
	WCD1 (12,500 bbls/day recovery)					
	No requirements	1,000 plus 300 per skimming system	12,500	25,000	6 for higher volume ports 12 for all other locations	12 for higher volume ports 24 for all other locations
	WCD2 (25,000 bbls/day recovery)					
	No requirements	1,000 plus 300 per skimming system	25,000	50,000	30 for higher volume ports 36 for all other locations	36 for higher volume ports 48 for all other locations
	WCD3 (50,000 bbls/day recovery)					
	No requirements	1,000 plus 300 per skimming system	50,000	100,000	54 for higher volume ports 60 for all other locations	60 for higher volume ports 72 for all other locations
Boom Properties	Boom height (draft plus freeboard) (inches)				≥ 42	
	Reserve buoyancy-to-weight ratio				3:1 to 4:1	
	Total tensile strength (lbs)				> 20,000	
	Skirt fabric tensile strength (lbs)				500	
	Skirt fabric tear strength (lbs)				125	

Prince William Sound Classification

General

The FRP and VRP regulations establish more stringent planning criteria for owners and operators of tank vessels loading cargo at a facility permitted under the Trans-Alaska Pipeline Authorization Act. OSROs intending to respond in the Prince William Sound, Alaska COTP zone also are classified to that standard.

Additional requirements concerning prepositioned equipment caches are found in 33 CFR § 154 Subpart G and 155 Subpart E.

DRAFT

Shallow Water Requirements

General

Depending on the operating area, a certain percentage of OSRO resources must be capable of operating in waters of 6 feet or less 33 CFR §§ 154.1045 and 155.1050, as shown in Table 14. Equipment must be identified in an OSRO's application to meet this requirement.

Table 14. Percentage of Response Equipment Capable of Operating in Shallow Waters

Area	Facility	Tank Vessel
Rivers/Canals	20	20
Great Lakes	20	20
Inland	20	20
Nearshore	20	20
Offshore	10	10
Open Ocean	None	None

Chapter 4 Description of Classifications Dispersant Providing OSRO's

Overview

Introduction

Dispersant providing OSROs are classified based on the location of response resources and an assessment of the ability to mobilize those resources to the Captain of the Port (COTP) zone or Alternate Classification City (ACC). There are equipment standards and response times specific to each operating area within a COTP zone. Additional requirements are outlined for the Prince William Sound, Alaska COTP zone. This chapter also discusses exercises, personnel training, and equipment maintenance specific to the dispersant providing OSRO classification program.

In This Chapter

This Chapter contains the following information:

Topic	Page
Resource Requirements	40
Response Times	42
Specific Classification Standards by Operating Region	43

Resource Requirements

Core Resources

Core resources are separated into 4 categories:

1. Dispersant Product
2. Effective Daily Application Capacity (EDAC)
3. Dispersant Application Platform
4. Aerial Oil Tracking and Application Capabilities

Dispersant Product

The VRP and FRP regulations 33 CFR § 155.1035 and 33 CFR § 154.1035 requires a plan holder to have available a sufficient volume of dispersant to support WCD and identify the primary staging site of the dispersant product. The dispersant product resource provider must also be identified and have the distance between the product's home base and the primary staging site.

Effective Daily Application Capacity (EDAC)

EDAC is determined using the Daily Mission Planner (DMP) calculator. The NSFCC will use the DMP, as specified in the regulations, to determine response times to the scene, EDAC, and adequate dispersant tracking based on an OSRO-submitted list that identifies the following: sufficient and appropriately trained personnel, vessels, delivery systems, dispersant, the location of each identified item, and any other input parameters specified in the calculator.

Dispersant Application Platform

Per the VRP and FRP regulations 33 CFR § 155.1035 and 33 CFR § 154.1035; the dispersant application platform must identify the type, supplier, location, and dispersant payload for each platform. The location must also identify the distance between the platform's home base and the primary staging site. If a shortfall is perceived, further discussion with the OSRO is warranted before a classification is considered.

Aerial Oil Tracking & Application Capabilities

Per the VRP and FRP regulations 33 CFR § 155.1035 and 33 CFR § 154.1035; the provider must be identified with the type and location of aerial surveillance aircraft that are ensured available, through contract or other approved means. Additionally, at least 50 percent of each EDAC tier requirement must be achieved through the use of fixed-wing, aircraft-based application platforms. The aerial platform must also be capable of arriving at the site of a discharge in advance of tiers 1, 2, and 3 Worst Case Discharge response times, and for a distance up to 50 nautical miles from shore (excluding inland rivers). This capability must be capable of supporting oil spill removal operations continuously for three 10-hour operational periods during the initial 72 hours of the discharge.

Continued on next page

Resource Requirements, continued

Personnel	The number of personnel needed to support a response depends on numerous factors that are explained in Chapter 2; however OSRO's seeking a dispersant classification should also consider that there must also be sufficient numbers of pilots and trained observation personnel to support aerial requirements.
WCD1 thru WCD3 Classifications	All WCD classifications require the ability to commence dispersant application operations at the <i>site of discharge</i> (see glossary) within 7 hours of the decision by the FOSC. To complete dispersant application for WCD 1 the dispersant provider has 12 hours, for WCD2 the dispersant provider has 36 hours, and for WCD3 the dispersant provider has 60 hours.
Response Plan Regulations and the Classification Program	<p>FRP and VRP regulations specify the quantity of resources required for a specific planning volume of 26,190 barrels.</p> <p>The requirements are categorized as the WCD. WCD is divided into Tiers 1, 2, and 3.</p>
Operating Areas	<p>Manufacturers design dispersant products and platforms with certain operating areas in mind. In the response plan regulations, these operating areas are identified as inland, nearshore, and offshore. In addition to operating areas, the Gulf Coast regions versus non Gulf Coast regions are used in determining classification status (see Glossary). The OSRO classification program classifies OSROs based on these areas.</p> <p>In this Chapter, the Section on Specific Classification Standards by Region lists specific requirements for EDAC for each region.</p>
EDAC Quantities	To receive a WCD1, WCD2, or WCD3 classification, a dispersant providing OSRO must meet all EDAC amounts to obtain a single classification, and each classification is determined independently for each region (see Table 15).

Table 15. EDAC Dispersant Amounts in gallons for OSRO Classifications

Region	WCD1	WCD2	WCD3	TOTAL
Gulf Coast	8,250	23,375	23,375	55,000
All other US	4,125	23,375	23,375	50,875

Response Times

General

In addition to resource quantities, dispersant providing OSROs are required to meet certain response times (33 CFR § 154.1045 and 33 CFR § 155.1050). The response times for classification were derived from the regulations and standardized for classification (33 CFR § 155.1050 (l)), and are summarized in Table 16.

Summary of Response Times

Table 16. Response Times in Hours for Completed Application of Dispersant

WCD1	WCD2	WCD3
12	36	60

Note: Dispersant application operations must commence within 7 hrs of decision by FOSC.

Specific Classification Standards by Region

Gulf Coast and all other US Regions

Minimum equipment standards and maximum response times for classifying OSROs for planned response to spills in the Gulf Coast Region and all other US regions are summarized in Table 17, which is derived from Tables 15-16.

Table 17. EDAC Standards and Response Times

Region	WCD1	WCD2	WCD3	TOTAL
Gulf Coast	8,250	23,375	23,375	55,000
All other US	4,125	23,375	23,375	50,875
Response Times (hours)	12	36	60	60

Chapter 5

Verification Process

Overview

Introduction

The verification process encompasses the initial site assessment plus subsequent follow on assessments. During resource verification, the Coast Guard ensures that resources are consistent with the OSRO's classification, examines equipment systems, and reviews maintenance and training programs.

In This Chapter

This Chapter contains the following information:

	Topic	Page
	Verifications	45

Verifications

Purpose

The Coast Guard may assess each site that an OSRO has included in an application to conduct a resource verification .

- Verify the resources identified in the application.
- Complete a visual equipment survey of the material condition of the response resources.
- Ensure the response resources are properly maintained and ensure that the maintenance is documented.
- Ensure the OSRO has sufficient personnel available and trained to mobilize, deploy, and operate the equipment identified in the OSRO application; that personnel meet the Hazardous Waste Operations and Emergency Response (HAZWOPER) requirements in 29 CFR § 1910.120; and that such is documented.
- Verify a cross-section of the inventory for systems operability and logistics support capability.
- Review records of participation in exercises.
- Review the site's logistics narrative (where applicable) and determine the status of the support services listed in the narrative (e.g., equipment rentals, commercial drivers, and personnel services, etc.) and their ability to mobilize and sustain the resources.

Resources Consistent with Classification

To determine whether the OSRO's dispersant product quantity are consistent with the classification level, the Coast Guard conducts a crosscheck of the OSRO's resource amounts to those required by the appropriate classification level.

Examination of Equipment Systems

When completing the visual equipment survey, the Coast Guard examines equipment systems from each response resource category that reflects a cross-section of the inventory on-site.

All systems that count toward classification must be in working order and able to be deployed into the marine environment. The OSRO may be required to operate one or more systems for the verification team.

NOTE: If the deployment of equipment for the verification process is equal in scope to that required by the PREP guidelines for equipment deployment, an OSRO may be able to gain credit toward that requirement if all other criteria are met.

Continued on next page

Verifications, continued

Review of Maintenance Program

The inspectors review the OSRO's maintenance program to ensure that the equipment is properly maintained. The verification team may consider, among other conditions, the following criteria:

Booms

- Overall condition
- Evidence of ownership, lease, or subcontract
- Manufacturer, type, and quantity
- Compatibility of connectors
- Number and adequacy of anchors
- Transportability
- Planned operating area(s)

Recovery Devices (Skimmers and Vacuum Trucks)

- Evidence of ownership, lease, or subcontract
- Manufacturer, type, model, and throughput capacity
- Compatibility of components (hoses, suction and skimmer head, couplings, connectors, etc.)
- Operability and maintenance
- Condition of the prime mover and other supporting equipment
- Holding capacity
- Planned operating area(s)

Oil Spill Response Vessels (Skimmers, Barges, and Support Craft)

- Evidence of ownership, lease, or subcontract
- Operability and maintenance
- Storage capacity
- Inspection/certification
- Planned operating areas
- Grade of oil carried
- Offload capability
- Length, beam, draft, range, transit speed, and crew size

Continued on next page

Verifications, continued

Temporary Storage Devices

- Evidence of ownership, lease, or subcontract
- Manufacturer, type, and model (as applicable)
- Capacity (twice the daily capacity of recovery devices)
- Inspected and maintained in accordance with manufacturer's recommendations
- Contracted barges with current certificates
- Planned operating area(s)
- Grade of oil carried
- Location of fixed storage

Boats

- Sufficient numbers of trailers, outboard motors, and Coast Guard-required safety equipment (life jackets, lights, etc.)
- Types and number of boats appropriate to the area of classification
- Operability and maintenance
- Length, beam, draft, range, transit speed, and crew size
- Adequate working platform for oil spill response
- Certification/registration

Dispersant

- Manufacturer, type, and quantity
- Volumes of dispersant(s) to support WCD tiers
- Stowage
- Identification of dispersant product resource provider
- Primary staging site location
- Distance between product's home base and primary staging site
- Amount of each stockpile required to support required EDAC of each dispersant application platform
- EDAC Determination – using Dispersant Mission Planner

Application Platform

- Type
- Providing resource organization
- Location(s), must identify distance between platform's home base and identified primary dispersant staging site
- Dispersant payload for each dispersant application platform

**Aerial Oil Tracking
& Application
Capabilities**

- Identification of resource provider
- Type and location of aerial surveillance aircraft available, through contract or other approved means
- At least 50 percent of each EDAC tier requirement must be achieved through the use of fixed-wing, aircraft-based application platforms
- Capability of arriving at the site of a discharge in advance of the arrival of response resources identified in the plan for tiers 1, 2, and 3 Worst Case Discharge response times, and for a distance up to 50 nautical miles from shore (excluding inland rivers)
- Capability of supporting oil spill removal operations continuously for three 10-hour operational periods during the initial 72 hours of the discharge
- Numbers of aircraft, pilots, and trained observation personnel

**Groups II through
IV within inland,
nearshore, or
offshore where
preauthorization
exists**

- Capability of commencing dispersant application operations at site of discharge within 7 hours of decision by FOSC
- Capability to meet Tier 1, 2, and 3 response times for completed applications Table 33 CFR § 155.1050(1)

Continued on next page

Verifications, continued

Mechanical and Dispersant OSROs:

Deficiency

Deficiencies that prohibit systems from being operable will be identified for the OSRO. OSROs will have opportunity to correct deficiencies without it effecting classification if the deficiency does not significantly affect the OSRO's overall response readiness.

The severity of the deficiencies may be sufficient indication that an OSRO is not capable of meeting its response objectives and in this case the Coast Guard may reduce or revoke the OSRO's classification until such time the deficiencies are corrected.

Correction

If an OSRO classification is reduced or revoked in accordance with the above guidelines that OSRO has 14 days to correct the deficiencies, at which time the Coast Guard may conduct a second OSRO site verification to determine whether to restore the original classification. OSROs unable to meet the 14 day deadline will have to be reevaluated through the full application process.

Records Must Clearly Indicate

- Equipment clearly marked for identification
- Records supporting claims of ownership, lease, or subcontract
- Complete maintenance records reflecting condition of equipment
- Personnel training records
- Exercise records

Verification of Training

Through documentation, discussions, and informal interviews, the Coast Guard verifies that all response personnel at the resource site are trained in accordance with HAZWOPER 29 CFR § 1910.120 and the OSRO's internal training program.

Prior to the Coast Guard's visit, the OSRO should check personnel records and subcontracting or consulting agreements to verify the number and availability of trained personnel listed in the application.

Continued on next page

Verifications, continued

Logistics Narratives	<p>An OSRO may be asked to provide a written narrative outlining the logistics requirements for each resource site used in its application. The logistics narrative is best presented using the Resource Site(s) Worksheet (Figure 2); however, any format may be used.</p> <p>Narratives must provide enough information to document that an OSRO has considered the myriad and complex logistics support requirements for the mobilization and delivery of the response equipment and personnel from each resource site to each COTP city or ACC requested. Narratives should contain, but are not limited to, the following:</p> <ul style="list-style-type: none">• Methods of personnel recall (if applicable)• Methods of loading resources for mobilization• Methods of resource transport off-site to incident or staging area• Methods of mobilizing, deploying, and supporting resources• Special response resources staging (e.g., prepackaging, palletizing, preloading)• Necessary site support services (e.g., tractors, trailers, drivers, cranes, etc.)
Appeal of Verification Visit	<p>An OSRO that disagrees with the results of a verification visit may appeal in writing to the Commanding Officer of the NSFCC within 30 days of the visit.</p> <p>If the OSRO remains unsatisfied with the determination after the appeal, a second appeal may be made to Coast Guard Headquarters.</p> <p>COMMANDANT (CG-533) U.S. Coast Guard Headquarters 2100 2nd St. SW Washington, DC 20593-0001</p>
Consultation with COTP(s)	<p>After consulting with the applicable COTP(s), classifications can be revoked or altered by the NSFCC. Some reasons for revoking or altering a classification include:</p> <ul style="list-style-type: none">• Resources identified in an OSRO application could not be verified.• Available response resources do not match the classification levels.• Response resources are unable to meet response times or do not function properly during drills, exercises, responses, and/or inspections.• OSRO fails to meet the training, maintenance, and exercise provisions of these guidelines.

Verifications, continued

Periodic Verification

An OSRO is subject to periodic examination to maintain its classification status.

Additional Verification

In addition to periodic examinations to maintain classification status, verifications may also occur for the following reasons:

- Unsatisfactory verification visit
- COTP request
- OSRO's poor performance during spill or exercises
- OSRO request
- Change in ownership
- Other reasons

Chapter 6 Additional Program Requirements

Overview

Introduction

A classified OSRO is required to review and submit to the NSFCC an updated inventory of its resource information annually and upon significant changes.

Annual Review

Each OSRO issued a classification letter by the NSFCC must annually review and verify that the resource information submitted for the original classification remains accurate, and that the equipment maintenance, personnel training, and exercises have been completed.

On completion of this review, the OSRO submits documentation to the NSFCC for an annual review. If any resource, maintenance, or training changes have occurred, the OSRO provides this information to the NSFCC so that their classifications can be updated as appropriate.

Notice of Change in Capability

Once classified, an OSRO must report any significant changes made to its response resources to the NSFCC and COTP within 72 hours.

Significant changes are defined as a reduction in the OSRO's classified capacity by a factor of 10% or greater, for a period of 48 hours or longer. Does this implicate the other COMDTINST/NVIC on coverage? Should it be mentioned here?

Acronyms

ACC	Alternate Classification City
ACP	Area Contingency Plan
bbl	barrel
CFR	Code of Federal Regulations
COTP	Captain of the Port
DMP	Daily Mission planner
EDAC	Effective daily application capacity
EDRC	effective daily recovery capacity
EEZ	Exclusive Economic Zone
FHVP	facility higher volume port
FRP	facility response plan
FWPCA	Federal Water Pollution Control Act
HAZWOPER	Hazardous Waste Operations and Emergency Response
kts	knots
LOI	letter of intent
MMPD	maximum most probable discharge
mph	miles per hour
NSFCC	National Strike Force Coordination Center
OPA 90	Oil Pollution Act of 1990
OSHA	Occupational Safety and Health Administration
OSRO	oil spill removal organization
PAV	Preparedness Assessment Visit(s)
PREP	National Preparedness for Response Exercise Program
RRI	Response Resource Inventory
TSC	temporary storage capacity
USC	U.S. Code
VHVP	vessel higher volume port
VRP	vessel response plan
WCD	worst case discharge

Glossary

Alternate Classification City (ACC)	A designated geographic location along the U.S. coastline used in addition to or in lieu of a COTP city for an OSRO classification. The following cities are identified as ACCs: Marquette, MI; Coos Bay, OR; Eureka, CA; Traverse City, MI; Alpena, MI; Oswego, NY; Cape Canaveral, FL; Morro Bay, CA; Panama City, FL; Cleveland, OH; Toledo, OH; Burr Ridge, IL; Huntington, WV; Prudhoe Bay, AK; and Paducah, KY.
Area Contingency Plan (ACP)	The plan prepared by an Area Committee in part to address removal of a WCD and to mitigate or prevent a substantial threat of such a discharge from a vessel, offshore facility, or onshore facility operating in or near an area designated by the President of the United States.
Captain of the Port (COTP) Zone	A zone specified in 33 CFR Part 3 and, for coastal ports, the seaward extension of that zone to the outer boundary of the EEZ.
Classification	A process for identifying OSRO capability within geographic locations on the basis of its ownership and/or control of specialized equipment and trained personnel used in the removal of oil from the area.
Containment Boom	Boom that is used to collect and hold oil on the surface of the water for recovery by skimmers or similar collection devices. The regulations require containment boom equal to 1,000 feet or twice the length of the largest vessel served, plus sufficient boom for the efficient operation of recovery devices. For classification, an OSRO is expected to have 1,000 feet of containment boom for each operating area in which it operates, plus 300 feet of containment boom for each recovery system used in its classification.
Contract	A written contractual agreement between the OSRO and its subcontractors. The agreement must identify and ensure the availability of specified personnel and response equipment, within stipulated response times, in the specified geographic areas.
Daily Mission Planner	The NOAA dispersant planning calculator that is available online at http://response.restoration.noaa.gov/oilaid/spilltool/st_info.html . The NSFCC will use the DMP as specified in regulations to evaluate an OSRO submitted list that identifies sufficient and appropriately trained personnel, vessels, delivery systems, dispersant, and any other input parameters specified in the calculator.

Glossary, continued

Dedicated Response Resources	Equipment and personnel dedicated primarily to oil spill response, cleanup, and spill containment. Such equipment and personnel are not utilized for any other activity that would affect their ability to provide oil spill response services adversely.
Dispersant Application Platform	Vessels and aircraft outfitted with dispersant-application equipment acting as the delivery system for the dispersant onto the oil spill.
Dispersant Product	Those products of a type that is listed on the National Oil and Hazardous Substances Pollution Contingency Plan Product Schedule (40 CFR Part 300), maintained by the Environmental Protection Agency.
Field Response Facility	See Resource Site.
Effective Daily Application Capacity	The estimated amount of dispersant that can be applied to a discharge by an application system given the availability of supporting dispersant stockpiles.
Effective Daily Recovery Capacity (EDRC)	The calculated capacity of oil recovery devices as determined by using a formula defined in 33 CFR §154, Appendix C and 33 CFR § 155, Appendix B that accounts for limiting factors such as daylight, weather, sea state, and emulsified oil in the recovered material.
Exclusive Economic Zone (EEZ)	The zone contiguous to the territorial seas of the United States, extending to a distance up to 200 nautical miles from the baseline from which the breadth of the territorial seas is measured.
Great Lakes	Operating area that includes Lakes Superior, Michigan, Huron, Erie, and Ontario; their connecting and tributary waters; the Saint Lawrence River as far as Saint Regis; and adjacent port areas.
Gulf Coast Region	The region encompassing the following COTP zones: 1) Corpus Christi, TX, 2) Houston/Galveston, TX, 3) Port Arthur, TX, 4) Morgan City, LA, 5) New Orleans, LA, 6) Mobile, AL, 7) St. Petersburg, FL
Higher Volume Port Areas	Ports listed in 33 CFR § 154.1020 and 33 CFR § 155.1020, including any water area within 50 nautical miles seaward of the port.

Glossary, continued

Inland	The operating area shoreward of the boundary lines (except in the Gulf of Mexico) defined in 46 CFR Part 7. In the Gulf of Mexico, it means the area shoreward of the line of demarcation (COLREG lines) as defined in Sections 80.740–80.850 of 33 CFR § Chapter I. The inland operating area does not include the Great Lakes.
Letter of Intent (LOI)	A document that identifies the personnel, equipment, and services capable of being provided by another commercial source to the OSRO within the stipulated response times in the specified geographic areas. It sets out the parties' acknowledgement that the commercial source intends to commit the resources in time of a response and that they agree to permit the Coast Guard to verify the availability of the identified response resources through notification drills, review of contracts, and site visits.
Maximum Most Probable Discharge (MMPD)	<ul style="list-style-type: none">• For a facility, a discharge of 1,200 barrels or 10% of the volume of a WCD, whichever is less.• For a tank vessel with a capacity equal to or greater than 25,000 barrels of oil, a discharge of 2,500 barrels.• For a tank vessel with a capacity of less than 25,000 barrels, a discharge of 10% of the tank vessel's oil cargo capacity.
Mobilization	The time it takes to get the resources assembled and prepared at the staging site. Mobilization begins when notification ends and ends when the resources are ready to move off-site.
Nearshore	The operating area extending seaward 12 nautical miles from the boundary lines (except in the Gulf of Mexico) defined in 46 CFR 7. In the Gulf of Mexico, it means the area extending seaward 12 nautical miles from the line of demarcation (COLREG lines) as defined in Sections 80.740–80.850 of 33 CFR § Chapter I.
Nondedicated Response Resources	Response resources with service that is not limited exclusively to oil or hazardous substance spill response-related activities.
Non-Persistent or Group I Oil	A petroleum-based oil that, at the time of shipment, consists of hydrocarbon fractions: <ul style="list-style-type: none">• At least 50% of which by volume distills at a temperature of 340°C (645°F)• At least 95% of which by volume distills at a temperature of 370°C 700°F)

Glossary, continued

Ocean	The nearshore, offshore, and open ocean operating areas as defined in these guidelines.
Offshore	The operating area up to 38 nautical miles seaward of the outer boundary of the nearshore area (12–50 miles).
Oil Spill Removal Organization (OSRO)	Any person or persons who own or otherwise control oil spill removal resources that are designed for, or are capable of, removing oil from the water or shoreline. Control of such resources through means other than ownership includes leasing or subcontracting of equipment or, in the case of trained personnel, by having contracts, evidence of employment, or consulting agreements. OSROs provide response equipment and services, individually or in combination with subcontractors or associated contractors, under contract or other means approved by the President, directly to an owner or operator of a facility or tank vessel required to have a response plan under 33 USC 1321(j)(5). OSROs must be able to mobilize and deploy equipment or trained personnel and remove, store, and transfer recovered oil. Persons such as sales and marketing organizations (e.g., distributorships and manufacturer's representatives) that warehouse or store equipment for sale are not OSROs.
Open Ocean	The operating area seaward of the outer boundary of the offshore operating area to the seaward boundary of the EEZ (50–200 miles).
Operating Area	Rivers/canals, Great Lakes, inland, nearshore, offshore, or open ocean. These terms are used to define the geographic location(s) in which a facility or tank vessel is handling, storing, or transporting oil.
Operating Environment	Rivers/canals, Great Lakes, inland, or ocean. These terms are used to define the conditions in which response equipment is designed to function.
Other Approved Means	For the purposes of these guidelines, means an LOI as defined in this Glossary.
Owned Resources	Equipment that belongs solely to the OSRO or personnel directly employed by the OSRO submitting an application for classification.

Glossary, continued

Persistent Oil	<p>A petroleum-based oil that does not meet the distillation criteria for a non-persistent oil. For the purposes of these guidelines, persistent oils are further classified based on specific gravity as follows:</p> <ul style="list-style-type: none">• Group II: specific gravity less than 0.85• Group III: specific gravity between 0.85 and less than 0.95• Group IV: specific gravity 0.95 to and including 1.0• Group V: specific gravity greater than 1.0
Pre - authorization	<p>Means an agreement, adopted by a regional response team or an area committee, which authorizes the use of dispersants at the discretion of the Federal on-scene coordinator without the further approval of other Federal or State authorities. These pre-authorization areas are generally limited to particular geographic areas within each region.</p>
Primary Staging Site	<p>Means a site designated within a Captain of the Port zone that has been identified as a forward staging area for dispersant application platforms and the loading of dispersant stockpiles. Primary staging sites are typically the planned locations where platforms load or reload dispersants before departing for application at the site of the discharge and may not be the locations where dispersant stockpiles are stored or application platforms are home-based.</p>
Protective Boom	<p>Boom used for deflecting/diverting or otherwise influencing oil on the water surface away from sensitive environments, often but not always toward containment sites.</p>
Resource Site	<p>A location where personnel and pollution response equipment are staged.</p>
Response Resource Inventory (RRI)	<p>The database of oil spill response resources developed by the Coast Guard to meet requirements of the OPA 90.</p>
Response Resources	<p>The personnel, equipment, supplies, and other capabilities necessary to perform the response activities identified in an FRP or VRP.</p>
Rivers/canals	<p>Operating area that includes bodies of water confined within the inland area, including the Intracoastal Waterways and other waterways artificially created for navigation, that have a project depth of 12 feet or less.</p>
Shallow-Draft Capable	<p>Equipment is capable of operating in waters of 6 feet or less depth.</p>

Glossary, continued

Skimming Systems	Devices used to remove spilled oil from the surface of the water through means of mechanical suction, adhesion, absorption, adsorption, or some similar mechanism of action that allows separation and recovery of spilled oil from the water's surface. Skimmers may be self-propelled, towed, or pushed through the water.
Systems Approach	An assessment of the infrastructure and support resources that an OSRO must have to mobilize, transport, deploy, sustain, and support the equipment resources necessary for the level of response for which classified (response readiness, trained personnel, personnel recall mechanisms, trucks, trailers, response vessels, etc.).
Temporary Storage Capacity (TSC)	Inflatable bladders, rubber barges, certificated barge capacity, or other temporary storage that is capable of being utilized on-scene at a spill response and is designed and intended for storage of flammable or combustible liquids. It does not include tank vessels or barges-of-opportunity for which no prearrangements have been made. Fixed shore-based storage capacity, ensured available by contract or other approved means, is acceptable in limited circumstances.
Tiers 1, 2, and 3	The combination of response resources and the times within which the resources must be capable of arriving on-scene to meet WCD resource requirements as defined in 33 CFR § 154.1020 and 33 CFR § 155.1025.
Worst Case Discharge (WCD)	In the case of an onshore facility and deepwater port, the largest foreseeable discharge in adverse weather conditions. In the case of a tank vessel, a discharge, in adverse weather conditions, of a tank vessel's entire oil cargo.

FORMS

FORM 1 USCG NSFCC Mechanical Field Verification Checksheet 61

FORM 2 USCG NSFCC Dispersant Field Verification Checksheet 62

DRAFT

Date of Visit: _____ COTP Zone _____ Initial Visit _____ or Follow up _____
Company Name: _____
Site Address: _____

UNITED STATES COAST GUARD
NATIONAL STRIKE FORCE COORDINATION CENTER
Mechanical Field Verification Checksheet

Verification Team

NSFCC Team: _____ Sector Rep: _____
Sector Rep: _____ Other: _____
State Rep: _____

The following report summarizes the changes of response resources at the above listed site since the last OSRO verification visit. Based on these results, classification may be changed unless additional information is submitted to the National Strike Force Coordination Center (NSFCC). If no additional information is submitted within 60 days of the verification date, your OSRO classification will be recalculated using this verification data. Further information regarding the USCG OSRO Classification Program may be obtained at <http://www.uscg.mil/hq/nsfweb/nsfcc/ops/ResponseSupport/RRAB/rrab.html>

Site Changes/ Additional Comments

1. _____
2. _____
3. _____
4. _____
5. _____

Verification Inspector (s)

National Strike Force Coordination Center
1461 N Road Street (US 17 N)
Elizabeth City, NC 27909
Attn: Response Resource Assessment Branch
(252) 331- 6000 ext 3034/3004/3057/3031
(252) 331- 6012 (fax)

Date of Visit: _____ COTP Zone _____ Initial Visit _____ or Follow up _____
Company Name: _____
Site Address: _____

UNITED STATES COAST GUARD
NATIONAL STRIKE FORCE COORDINATION CENTER
Dispersant Field Verification Checksheet

Verification Team

NSFCC Team: _____ Sector Rep: _____
Sector Rep: _____ Other: _____
State Rep: _____

Primary Staging Site

Location: _____

Dispersant Provider (for each provider)

Name: _____ Location: _____

Distance to Primary staging site (Miles): _____

Dispersant Product Description: _____ Stockpile Amount _____

Platform Type (for each platform) continue on reverse if necessary

Type: _____ Quantity _____

Provider (if owned notate): _____

Location: _____

Distance to Primary staging site (Miles): _____

Dispersant payload for platform: _____

Record Verification (list any discrepancies)

Means to apply 50 % of EDAC tier requirements via fixed wing aircraft-based platform (Yes or No)

Personnel Records verified and include training records and job descriptions with responsibilities and duties.
(Yes or No) _____

Remarks: _____

Verification Inspector (s) _____

National Strike Force Coordination Center
1461 N Road Street (US 17 N)
Elizabeth City, NC 27909
Attn: Response Resource Assessment Branch
(252) 331- 6000 ext 3034/3004/3057/3031
(252) 331- 6012 (fax)

Date of Visit: _____ COTP Zone _____ Initial Visit _____ or Follow up _____
Company Name: _____
Site Address: _____

Platform Type

Type: _____ Quantity _____

Provider (if owned notate): _____

Location: _____

Distance to Primary staging site (Miles): _____

Dispersant payload for platform: _____

Platform Type

Type: _____ Quantity _____

Provider (if owned notate): _____

Location: _____

Distance to Primary staging site (Miles): _____

Dispersant payload for platform: _____

Platform Type

Type: _____ Quantity _____

Provider (if owned notate): _____

Location: _____

Distance to Primary staging site (Miles): _____

Dispersant payload for platform: _____

Platform Type

Type: _____ Quantity _____

Provider (if owned notate): _____

Location: _____

Distance to Primary staging site (Miles): _____

Dispersant payload for platform: _____

Verification Inspector (s)

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